

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

JONES et al.,

Plaintiffs,

v.

Varsity Brands et al.,

Defendants.

Case No. 2:20-cv-02892-SHL-cgc

**JOINT MOTION TO PERMIT THE DEPOSITION OF DEFENDANT JEFF WEBB TO
BE TAKEN AFTER THE CLOSE OF FACT DISCOVERY, SUPPORTING
MEMORANDUM AND CERTIFICATE OF CONSULTATION**

The Parties, through their respective counsel of record, move this Honorable Court to permit the deposition of Defendant Jeff Webb (“Webb”) to be taken after the close of fact discovery in the above-captioned matters and all other matters subsequently consolidated with them (collectively, the “Actions”). In support of this motion, the Parties states as follows:

1. The close of fact discovery is April 18, 2022. [ECF No. 175].
2. Lead counsel for Mr. Webb will be representing a client in a criminal trial specially set for April 4, 2022 in the United States District Court for the Eastern District of Texas. The trial is expected to last at least two weeks. Proposed dates for a deposition of Mr. Webb, prior to the close of discovery, conflict with lead counsel’s trial setting.
3. Accordingly, the parties propose to take the deposition of Mr. Webb after the discovery deadline on a mutually agreeable date.
4. All Parties consent to the relief requested in this Motion.
5. Plaintiffs in Fusion Elite All Stars, et al. v. Varsity Brands, LLC, et al., Case No. 2:20-cv-02600-SHL-cgc; and American Spirit v. Varsity Brands, Case No. 2:20-cv-02782-SHL-cgc will cross notice this deposition and do not object to this Motion.

WHEREFORE, the Parties respectfully move this Court to allow the Parties to take the deposition of Defendant Jeff Webb after the close of fact discovery, but no later than May 13, 2022, and for further relief to which they may be entitled.

The undersigned hereby certifies that on March 10, 2022, pursuant to Local Rule 7.2(a)(1)(B), the Parties consulted regarding the issues raised in this motion, and all Parties consent to the relief requested.

A proposed order granting the Joint Motion to Permit the deposition of Defendant Jeff Webb to be taken after the close of fact discovery is being emailed to Judge Lipman.

Dated: March 14, 2022

By: /s Joseph R. Saveri

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document has been served on all counsel of record via the Court's CM/ECF system on this 14th day of March, 2022.

/s/ Paul E. Coggins
Paul E. Coggins